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March 23, 2023

Via ECF

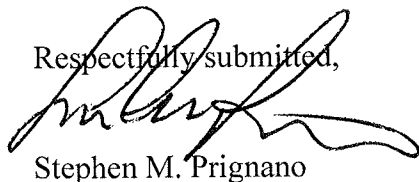
Hon. William E. Smith
United States District Court
One Exchange Terrace
Providence, RI 02903

Re: Fuog v. CVS Pharmacy, Inc. and Caremark PHC, LLC
Civil Action No. 1:20-cv-00337-WES-LDA

Dear Judge Smith:

This report is submitted in accordance with the Rule 16 conference conducted by the Court on February 22, 2023. Subsequent to the conference, the parties met and conferred regarding a phased approach to discovery in this matter. As a result of those discussions, the parties agreed to conduct an initial round of reciprocal discovery regarding certain fundamental aspects of the parties' claims and defenses. The parties have also reached an agreement regarding the scope of discovery requests to be propounded in this initial phase. Discovery conducted in this initial phase would be without prejudice to the rights of either party to seek additional or more limited discovery in any subsequent phase. Based on their agreements, the parties propose that a period of 90 - 120 days be allotted to discovery in this initial phase, at the end of which period the parties would report to the Court concerning their progress. The parties are available to discuss this proposal at Your Honor's convenience should the Court so desire.

Respectfully submitted,



Stephen M. Prignano

cc: All counsel of record via ECF